Message

**From:** Rogers, Rick [rogers.rick@epa.gov]
**Sent:** 7/12/2021 6:13:26 PM
**To:** Henry, JeannaR [Henry.Jeannar@epa.gov]
**Subject:** FW: For ECAD Review: Example Sampling Plan (DC Water)
**Attachments:** DC0000002 LCR Sample Plan 2021_web.pdf; LCR Guidance Manual Volume I - Monitoring (Sept 1991).pdf; R8_lcr_tap_sample_site_plan.pdf; R8_lcr_tap_sample_site_plan_instructions.pdf

Is Amy on today's inspection or is she available to take a look at these docs. This is all just an effort to provide Clarksburg with a good example of a sampling plan, so if Amy isn't available, I don't think anyone else has the expertise to review unless Leah, Sara or Miranda want to do a crash course on LCR sampling plans.

Rick Rogers, Chief
Water Branch (3ED30)
Enforcement and Compliance Assurance Division
U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103
rogers.rick@epa.gov
Office: 215.814.5711
Cell: 215.341.4762

---

**From:** Zirilli, Alysa <Zirilli.Alysa@epa.gov>
**Sent:** Monday, July 12, 2021 1:06 PM
**To:** Rogers, Rick <rogers.rick@epa.gov>; Henry, JeannaR <Henry.Jeannar@epa.gov>
**Cc:** Crumlish, Karen <Crumlish.Karen@epa.gov>; Rizzo, George <Rizzo.George@epa.gov>; Gillespie-Marthaler, Leslie <GillespieMarthaler.Leslie@epa.gov>
**Subject:** For ECAD Review: Example Sampling Plan (DC Water)

Hi Jeanna and Rick. To help Clarksburg assemble its own LCR sampling plan in accordance with WV's Order, we've been asked to provide an example. We now ask that ECAD review these materials before we share with WVDHHR. My sincere gratitude to George Rizzo (copied here) for his continued excellent expertise and insight. **For your review**, attached are:

1. DC Water's 2021 LCR sampling plan. NOTE: this plan is on DC Water's own website; I spoke with Maureen Schmelling today who said it need not be redacted since it's publicly available on their own site (including addresses).
2. Region 8's DI template & instructions for creating a LCR sampling plan

Additional helpful information for WVDHHR and Clarksburg
LCR Guidance Manual (attached) to address the materials inventory and sample site plan, together with the following info:

- Materials inventory – Because there are large differences between PWSs, materials inventory procedures need to be developed by each system. The LCR includes the minimum requirements for review. EPA guidance includes many more suggestions for items to review. The original LCR Guidance Manual Vol. 1 includes materials inventory development information in Chapter 3 and Appendix B. Clarksburg needs to document the sources that it uses to develop its inventory.

- Sample site plan – Chapter 3 also includes information on developing a sample site plan. The sample sites need to be identified and selected based on the inventory information.

- LSL identification methods – Currently, this is a "hot" topic in the water industry with a lot of information being generated almost daily. We recommend that Clarksburg be advised to search the web, including but not limited to AWWA, for the latest material. We also suggest that they review the web sites of some larger PWSs which have posted recommendations to their customers about how to identify LSLs within their premises. Here are links to DC Water's (https://www.dcwater.com/lead) and the Philadelphia Water Department's (https://water.phila.gov/lead/).

- Another method that Clarksburg could use to identify a LSL is to collect a second sample after the first draw sample. The second sample will not be considered a compliance sample if the first draw sample was considered to be one. They may also want to collect a second sample after a first-draw non-compliance sample. In either case, the second sample should be one-liter, and collected about 5 to 6 liters after the first. The timing is dependent on the length of the service line. The samples should be analyzed in each of two ways. The LCR required method requires that the sample be acidified so that any lead particles are totally dissolved before analysis. The result will be the total lead amount as required by the LCR. The other method is to filter a portion of the sample to remove lead particles, and then analyze the filtrate separately. If the filtered lead result is much less than the acidified sample result, it is likely that lead particles are detaching from the service line interior and the service line is likely.

- Proposed CCT – We know that Clarksburg is using pH adjustment as its CCT, but we don't know to what level. Clarksburg may want to consult with WVDHHR to consider raising the pH if possible. Comparison to other WV PWSs may be helpful.

- Another aspect that WVDHHR may want to consider if a thorough and accurate materials inventory is completed: if Clarksburg can verify that their system has relatively few partial or full LSLs still in place, they may want to consider voluntary full replacement of the remaining partial and full LSLs as an alternative to additional CCT. Over time, full replacement may be more effective and less expensive than the cost of treatment devices and chemicals and more permanent. WV should develop and document an enforceable schedule for a replacement program.

- Partial or full LSLR – Whenever possible, a CWS should conduct a full LSLR. The current LCR does not require full LSR when a PWS is required to replace LSLs. When service line ownership is shared, the LCR requires the PWS to notify the customer and to encourage the customer to replace their portion of the LSL when the system is replacing its portion. Clarksburg should be advised to check their eligibility for financial assistance under the DWSRF or other sources to help fund full LSLRs.

-Alysa